



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Subject: Final Decision Document
East Coast Chemical Disposal
201 East 10th Street, Marcus Hook PA 19061

From: Griff Miller
RCRA Project Manager

To: Abe Ferdas
Director, Land and Chemicals Division

Through: *Paul Gotthold*
Paul Gotthold
Associate Director, Land and Chemicals Division

Date: September
9, 2009

Attached for your signature is the Final Decision Document for the East Coast Chemical Disposal facility.

The East Coast Chemical facility never existed at the location above, as its hazardous waste permit application was denied by PADER in June 1987. Since East Coast Chemical never owned or occupied this location, Corrective Action activities are not applicable to this facility.

Please sign the attached Final Decision document to declare this as the final agency decision.

CONCURRENCES							
SYMBOL	3LC30	3LC30	3LC00				
SURNAME	G. Miller <i>GM</i>	P. Gotthold	A. Ferdas				
DATE	9-9-09	<i>PG</i> 9-9-09	<i>AF</i> 9-9-09				

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

FINAL DECISION DOCUMENT

East Coast Chemical Disposal Company
201 East 10th Street
Marcus Hook, PA 19061
EPA ID NO. PAD980706162

I. FINAL DECISION - Corrective Action Not Applicable

The United States Environmental Protection Agency (EPA) has determined that the Corrective Action program does not apply to the East Coast Chemical Company (Facility) at 201 East 10th Street in Marcus Hook, Pennsylvania (Property). The Facility never owned or occupied this Property.

II. BACKGROUND


In August 1982 the Facility submitted its initial hazardous waste permit application for the Property. After several revisions and a period of no response from the Facility, the Pennsylvania Department of Environmental Resources denied their hazardous waste permit application in June 1987. The Facility never operated at the Property; however, other owners of the Property may have contributed to possible contamination of the Property. The cleanup of the Property is currently being addressed by the Pennsylvania Department of Environmental Protection's Hazardous Sites Cleanup Program.

III. AUTHORITY

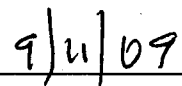
EPA is issuing this Final Decision under the authority of the Solid Waste Disposal Act, as amended by RCRA, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 to 6992k.

IV. DECLARATION

Based on the Administrative Record compiled for Corrective Action at the East Coast Chemical facility, EPA has determined that the Facility never owned or occupied the Property; therefore, Corrective Action activities are Not Applicable to this Facility.

A handwritten signature in black ink, appearing to read "Abraham Ferdas", is written over a horizontal line.

Abraham Ferdas, Director
Land & Chemicals Division
U.S EPA Region III

A handwritten date "9/11/09" is written over a horizontal line.

Date



Pennsylvania Department of Environmental Protection

2 East Main Street
Norristown, PA 19401

November 17, 2009

Southeast Regional Office

Phone: 484-250-5960

Fax: 484-250-5961

Mr. Paul Gotthold
Office of PA Remediation
Land and Chemical Division
EPA, Region 3 (3WC22)
1650 Arch Street
Philadelphia, PA 19103

Re: Environmental Indicator Determinations
EI Report and Forms
East Coast Chemical Disposal, Inc.
PAD No. 980706162

Dear Mr. Gotthold:

Enclosed are Environmental Indicator (EI) determination documents, along with supporting report prepared by URS Corporation (URS) under contract with the Pennsylvania Department of Environmental Protection (PADEP) for the following facility:

East Coast Chemical Disposal, Inc., PAD No. 980706162, located at 201 East Tenth Street, Marcus Hook, PA 19061, Borough of Marcus Hook, Delaware County.

We have reviewed the report and EI worksheets, and based upon the information in the report, we concur with the consultant's conclusions that no further action is required and the PAD No. 980706162 could be closed for the above-referenced site. A copy of URS's report and signed EI determination worksheets are being forwarded to you for the above site under cover of this letter.

Also enclosed, please find two CDs containing electronic files and PDF files of the EI report, checklists, and the PADEP files for East Coast Chemical Disposal, Inc., site. If you have any questions on these submissions, please feel free to call Mr. Dinesh Rajkotia at 484-250-5738.

Sincerely,

Mohamad M. Mazid, Ph.D., P.E.
Chief, Engineering Services
Waste Management Program

Enclosures: EI Worksheets
EI Report

cc: Mr. Harner – Bureau of Waste Management
Ms. Herr - URS Corporation
Re 30 (GJE09WM)313-3

**United States Environmental Protection Agency Region III
Corrective Action Program**

ENVIRONMENTAL INDICATOR INSPECTION REPORT

East Coast Chemical Disposal, Inc.

**201 East Tenth Street
Marcus Hook, Pennsylvania 19061
USEPA ID PAD980706162**

**Prepared for
Pennsylvania Department of Environmental Protection
Harrisburg, Pennsylvania**



Prepared By

URS

**4507 North Front Street
Suite 200
Harrisburg, Pennsylvania 17110
PADEP GTAC4-0-252
URS Project # 20497883**

RECEIVED
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84-0144-6 AM 10:48
RECEIVED

November 2009

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B	Site Photographic Log

GLOSSARY OF ACRONYMS

Courtaulds	Samuel Courtauld and Company
ECCD	East Cost Chemical Disposal, Inc.
EI	Environmental Indicator
HSCA	Hazardous Sites Cleanup Act (PADEP)
IUC	IU Conversions
MHBCC	Marcus Hook Business and Commerce Center
MHC	Marcus Hook Corporation
MHDPI	Marcus Hook Development Park Incorporated
MHPI	Marcus Hook Processing, Inc.
NPL	National Priorities List (USEPA)
NUS	NUS Corporation
PADEP	Pennsylvania Department of Environmental Protection
PAR	Preliminary Assessment Report
RCRA	Resource Conservation and Recovery Act
SERO	Southeast Regional Office (PADEP)
URS	URS Corporation
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
WWTP	Wastewater Treatment Plant

DISCLAIMER

This Environmental Indicator Inspection Report for East Coast Chemical Disposal, Inc. report contains background/historical information and other data, which URS Corporation has used in preparing this report, have been furnished by the United States Environmental Protection Agency, Pennsylvania Department of Environmental Protection, and/or third parties. URS Corporation has relied on this information as furnished, and is neither responsible for, nor has confirmed, the accuracy of all of the historical information. This report is based on data, site conditions, and other information collected from May 2008 through August 2009, and the conclusions and recommendations herein are therefore applicable to that time frame.

1.0 INTRODUCTION

The United States Environmental Protection Agency's (USEPA) Land and Chemicals Division, Office of Resource Conservation and Recovery Act (RCRA) Programs previously used the voluntary corrective action program for hazardous waste management facilities under USEPA Permits/Orders. This program was recently expanded to address low and medium priority facilities in Region III, which includes facilities that may not be under USEPA or Pennsylvania Department of Environmental Protection (PADEP) Permits/Orders. Voluntary corrective action program objectives are similar to corrective action program objectives for facilities under USEPA/PADEP Permits/Orders.

URS Corporation (URS) was contracted by PADEP to gather relevant information in order to determine whether human exposures to Site-specific wastes and/or groundwater releases have been controlled through interim measures or through state-ordered final remedies for several unaddressed medium/low priority facilities in Region III, including the East Coast Chemical Disposal, Inc. facility ('ECCD', 'Facility,' 'Site,' or 'Property'), which reportedly was to be located at 201 East Tenth Street, Building 6B, in Marcus Hook, Delaware County, Pennsylvania⁽²³⁰⁾. Building 6B is located on a 2-acre lot (Lot 6) that is part of the 40-acre subdivided 201 East Tenth Street property. The Facility intended to lease Building 6B if their hazardous waste permit was approved; however as will be discussed in Section 2.3, the Facility's hazardous waste permit was denied and the Facility never operated onsite^(70,71,230).

The 40-acre property on which Building 6B is located was proposed to the USEPA National Priorities List (NPL) on January 18, 1994. Cleanup of soil, groundwater, surface water, and sediment at the East Tenth Street property related to the storage, treatment, and disposal practices by former property owners (known as the East Tenth Street Hazardous Sites Cleanup Act [HSCA] Site) is being addressed through PADEP actions and is not discussed in detail in this document. A brief summary of the history of the Site, which includes references to the East Tenth Street HSCA Site, is presented in Section 2.2. However, the remaining sections of this report focus on the ECCD Facility (Building 6B).

1.1 Scope of Work

1.1.1 Regulatory Agency File Reviews

URS conducted an extensive records search at the PADEP Southeast Regional Office (SERO) file room; results of which include a scanned library of PADEP documents, which is provided on compact disc in **Appendix A**. In addition, records acquired from the USEPA Region III Philadelphia Office were reviewed. Pertinent USEPA documents were photocopied and have been retained in URS' files; but, at USEPA's request, have not been included in this report. A list of documents obtained is presented in **Appendix A** and references to these documents are noted (via superscript text) throughout this report. It should be noted that documents related to the East Tenth Street HSCA Site and KS Processing, Inc. (a pathological waste incinerator that has operated on the property since 1982) were contained in PADEP's file for the proposed ECCD Facility. URS reviewed these documents to evaluate whether there was a relationship among these facilities. It was determined that the East Tenth Street HSCA Site and the KS Processing, Inc. facility are separate entities from the proposed ECCD Facility. A brief discussion of these facilities and how they relate to the subject property is presented in Section 2.2; however, a detailed discussion related to permitting, inspections, and/or site investigations relative to these facilities is not presented in this report.

1.1.2 Site Visit

A Site visit was conducted on September 12, 2008, at the Facility. Participants of the meeting included representatives from PADEP, Parts Exchange (current occupant of Building 6B), and URS. The participants are listed in **Table 1**. URS and PADEP presented the Parts Exchange representative with information regarding the USEPA Region III Corrective Action process, the Environmental Indicator (EI) Assessment Program, and the legislation driving this program. URS provided the Parts Exchange representative with a synopsis of the information collected from the regulatory agencies, while the Parts Exchange representative provided PADEP and URS with a tour of the Site. Photographs were taken with permission of the Parts Exchange representative and are provided in **Appendix B**. The Site visit concluded with a discussion of outstanding issues identified during the file review process and the Site visit.

2.0 SITE SETTING AND OPERATIONAL HISTORY

2.1 Site Setting

The proposed Facility was to have been located within Building 6B that occupied approximately two acres of a 40 acre subdivided commercial business development located in Marcus Hook, Delaware County, Pennsylvania. The Property can be located on the United States Geological Survey (USGS) Marcus Hook, Pennsylvania 7.5-minute Topographic Quadrangle at 75° 24' 40" west longitude and 36° 47' 31" north latitude (**Figure 1**). The Property is located approximately 0.6 miles northwest of the Delaware River, near the New Jersey and Delaware borders. Marcus Hook has an estimated population of 2,258 residents (Source: United States Census Bureau, 2006).

Land use in the surrounding area is mainly industrial and residential as indicated by the 2005 aerial photograph presented as **Figure 2**. The Property is bordered to the north by East Tenth Street followed by residential structures, industrial facilities, and railroad tracks. To the east and south, the Property is bordered by Penn Avenue and a railroad spur. Marcus Hook Creek flows to the south along the eastern Property boundary to the Delaware River. Baseball fields and industrial facilities are located to the west of the Property. As shown on the site location map provided as **Figure 1** and the aerial photograph provided as **Figure 2**, several tank farms exist to the west, south, and east of the subject Property. According to the Delaware County Real Estate and Tax Records System (2009), these tank farms are owned by Sunoco, Marcus Hook Refining Company, and BP Corporation, respectively.

The 40-acre property is subdivided into 23 separate lots as shown on **Figure 3**. The majority of the historical structures have been demolished. Only 12 structures remain onsite. These buildings have been leased or sold to many different businesses over the last 30 years, several of which have operated or currently are operating under interim status. Current occupants include Quilan Scenic Studios (a producer/creator of scenery and staging for theater), Parts Exchange, Taylor Rental, Healthcare Waste Solutions (formerly KS Processing, Inc.), and Bucks County Resource Recovery (formerly Safety Disposal Systems of Pennsylvania). Parts Exchange is located in Building 6B, the location for the formerly proposed Facility (**Figure 3**).

As discussed in Section 1.1.1, documents related to the East Tenth Street HSCA Site and the KS Processing, Inc. facility (currently Healthcare Waste Solutions) were contained in PADEP's files with documents relating to the proposed ECCD Facility. These files were reviewed to identify any relationship with the ECCD Facility; however, it has been determined that the three entities are separate from one another. Therefore, a brief description of the history of the property is provided in Section 2.2 and a detailed discussion of the permitting history for the ECCD Facility is presented in Section 2.3.

2.2 Site Background

In March 1910, the 40-acre property was leased to American Viscose Company, a subsidiary of Samuel Courtauld and Company (Courtaulds), who constructed and operated an extensive rayon production facility⁽²¹⁹⁾. In 1937, the property was sold to American Viscose Corporation who continued rayon production onsite⁽²¹⁹⁾. In 1949, the Sanitary Water Board issued an Industrial Wastes Permit to American Viscose Company, requiring the installation of an onsite wastewater treatment plant (WWTP)⁽¹⁾. The WWTP was located on 4 acres on the southeastern corner of the property, south of Lot 16 (**Figure 3**).

Rayon production continued from 1937 to 1954. From 1954 to 1958, the American Viscose Corporation functioned as an experimental station⁽¹⁰¹⁾, and in 1958, cellophane production began. In 1963, the 40-acre property was sold to FMC Corporation. FMC Corporation continued with production of cellophane until 1977 when operations were ceased at the Site⁽²¹⁹⁾.

The 40-acre property was purchased by a Pittsburgh group in 1978 for purposes of salvaging the existing equipment⁽²¹⁹⁾. Later the same year, the property was acquired by Marcus Hook Development Park, Incorporated (MHDPI) who leased some of the existing buildings, including Building 6B, to a range of businesses, which included KS Processing, Inc., a pathological waste incinerator who occupied Lots 16 and 18 (now known as Healthcare Waste Solutions, **Figure 3**).

In 1979, the approximately 4 acre former WWTP was sold to IU Conversions (IUC, later known as Conversion Systems, Inc., Envirosafe Management Corporation, and Envirosafe Systems, Inc.). IUC operated the WWTP as an industrial wastewater treatment facility until 1984 when operation of the WWTP ceased⁽²¹⁹⁾. The assets of IUC ultimately were sold to Marcus Hook Processing, Inc (MHPI) in 1984. This portion of the former rayon/cellophane production facility is no longer part of the original property.

In 1986, the 40-acre property was sold to Marcus Hook Business and Commerce Center (MHBCC). MHBCC began renovating some of the existing structures and demolishing others. At the same time, MHBCC subdivided the property into 23 separate lots. Fourteen (14) of the lots (1, 3, 4, 7, 8, 9, 10, 11, 12, 13, 14, 15, 17, and 22) were sold to Marcus Hook Corporation (MHC) in 1990⁽²¹⁹⁾.

According to the Delaware County Real Estate and Tax Records Usage System (2009), the majority of the lots are currently owned by Keystone Community Alliance (Marcus Hook Developers, LP). Lot 6, on which Building 6B is located, is reportedly owned by Equity Brokerage Corp (Delaware County, 2009).

The East Tenth Street property was proposed to the USEPA NPL in January 1994 and has been the focus of numerous State-led environmental investigations and remediation efforts related to storage, treatment, and disposal of hazardous materials and wastes related to the former rayon and cellophane production facilities. However, as will be discussed in Section 2.3, the subject Facility (ECCD) was denied a hazardous waste permit and the Facility never operated at the East Tenth Street property. Therefore, the ECCD Facility has not contributed to the soil, groundwater, surface water, and sediment contamination identified at the property nor is it related to the cleanup efforts underway at the property.

2.3 Permitting History

In December 1981, the Facility submitted a Hazardous Waste Permit Application to USEPA for a proposed commercial container storage/treatment facility located in Levittown, Bucks County, Pennsylvania⁽¹⁾. In January 1982, the Facility submitted a Part B permit application for the Levittown facility⁽⁹⁾. The Facility subsequently was issued USEPA ID PAD980551162; however, the Levittown facility was never constructed^(70,107).

In August 1982, the Facility resubmitted their Part A Hazardous Waste Permit Application to USEPA to operate the proposed commercial container storage/treatment facility in Building 6B of the East Tenth Street property located in Marcus Hook⁽¹⁷⁾. As discussed previously, the

proposed Facility was to be constructed in Building 6B located on Lot 6, which is part of the 40 acre 201 East Tenth Street property. Building 6B and Lot 6 were owned by MHDPI. The Facility intended to lease a portion of Building 6B if their hazardous waste permit was approved.

The revised Part A application was assigned USEPA ID PAD980706162. In September 1982, the Facility submitted a Notification of Hazardous Waste Activity form to USEPA, filing as a hazardous waste treatment and storage facility and as a transporter of hazardous wastes; and in November 1982, the Facility submitted a revised Part B application to USEPA for the Marcus Hook facility⁽²¹⁾. In December 1982, USEPA issued a Notice of Deficiency for the Part B application⁽²²⁾.

According to the Part B application documents⁽⁹⁾, drummed liquid and semi-solid industrial wastes were to be received onsite from outside facilities. Wastes proposed to be handled at the Facility included wastes with USEPA codes F001 through F018, K001 through K069, P001 through P122, and U001 through U239. The wastes would be either physically or chemically treated in containers. Physical treatment was to include stabilizing and solidifying sludges and absorption of free liquids by addition of fly ash and/or vermiculite. Chemical treatment was to consist of neutralization, oxidation-reduction, cyanide destruction, and dissolved metals precipitation. Treated wastes then were to be stored in drums and transported offsite to a permitted landfill for disposal. Spent solvents with commercial value were to be transported offsite to a solvent recovery facility for reclamation. No disposal was to take place onsite⁽⁹⁾.

On January 11, 1983, the Facility submitted a revised Part A application to PADEP for the Marcus Hook facility⁽¹⁰⁷⁾. Amendments to the Part A application were submitted to PADEP in December 1983, February 1984, April 1984, June 1984, and October 1984⁽¹⁰⁷⁾, and a final revised Part A application was submitted to PADEP in July 1985. Based on the information received, USEPA and PADEP issued a Joint Notice of Proposed Issuance of Permit under RCRA on August 2, 1985⁽⁴³⁾. However, because the Facility failed to respond to final review letters issued by PADEP on October 11, 1985 and January 5, 1987, PADEP issued a Notice of Preparation for the Denial of Hazardous Waste Treatment and Storage Facility Permit on March 5, 1987⁽⁷⁰⁾. According to a letter issued by PADEP to a principal party of the Facility, the permit was also denied for the following reasons⁽⁷⁰⁾:

1. The Facility failed to submit a bond to cover the total liability for closure of the Facility;
2. The landowner consent form was invalid because property ownership was transferred to another entity after submittal of the hazardous waste permit application; and
3. There was a history of violations of the Solid Waste Management Act and the Pennsylvania Clean Streams Law at a separate facility owned by the principal party of ECCD. PADEP contended that this indicated unwillingness to comply with State environmental statutes, thus preventing issuance of a permit for the ECCD Facility.

PADEP issued the denial letter for the permit related to USEPA ID PAD980551162, which was the USEPA ID number assigned to the proposed Levittown facility, on June 1, 1987⁽⁷¹⁾. No further documentation was identified regarding the outcome for the permit application associated with USEPA ID PAD980706162.

In 1990, NUS Corporation (NUS) was contracted by USEPA to prepare an Environmental Priorities Initiative Preliminary Assessment Report (PAR) for the Facility⁽¹⁰⁷⁾. According to the

PAR, Lot 6 and Building 6B were owned by Strath Haven Realty, and Building 6B was leased to an unnamed tenant. NUS further stated that the Facility never operated onsite and no further action was needed.

3.0 CONCLUSIONS AND FOLLOW-UP ACTION ITEMS

Using known and available information obtained from USEPA and PADEP, URS has determined that while the proposed Facility was intended to occupy a building situated on a 2-acre lot of a 40-acre property that has been proposed to the USEPA NPL, and at which there is ongoing State-led investigation and remediation activity, the Facility was denied a hazardous waste permit and has never operated at the Site. Therefore, the Facility has not contributed to the contamination identified at the property, and there are no exposure pathways for releases or potential releases related to this Facility. No further follow up action is required for this Facility.

Please note that based on URS' review of available documentation, the Facility was issued USEPA ID PAD980551162 for a facility to be constructed in Levittown, Pennsylvania. However, as discussed, this facility was never constructed, and ECCD resubmitted an application to construct a hazardous waste treatment and storage facility in Marcus Hook, Pennsylvania. This application was assigned USEPA ID PAD980706162. PADEP's 1987 denial of the Facility's hazardous waste management permit application referenced USEPA ID PAD980551162. NUS' 1990 PAR, which was prepared for USEPA ID PAD980706162, confirmed the denial of application PAD980551162 and recommended no further action for the Facility. A subsequent 1995 inspection by PADEP for PAD980706162 indicated that the Facility never existed at the site. Based on this information, it appears that PAD980551162 was closed; however, PAD980706162 remains open and should be closed.


4.0 REFERENCES

Delaware County Real Estate and Tax Records Usage System.
<http://w01.co.delaware.pa.us/pa/publicaccess.asp?real.x=1>

United States Census Bureau. <http://factfinder.census.gov/> accessed August 26, 2007.

RCRA Land Revitalization Indicators

Status of Use & Type of Use

	United States ENVIRONMENTAL PROTECTION AGENCY Region III, Philadelphia, PA		
1. Date: November 3, 2009			
2. Facility Name East Coast Chemical Disposal, Inc.		3. EPA ID PAD980706162	
4. Your Name Dinesh Rajkotia Waste Management Program		5. Organization United States Environmental Protection Agency – EPA Region 3 1650 Arch Street (3PM52) Philadelphia, PA 19103-2029	
6. Total Acres 2.0 acres			
Continued Use: Total acres _____	Reused: Total acres <u>2.0 acres</u>	Planned Reuse: Total acres _____	Unused: Total acres _____
Types of Use <input type="checkbox"/> Agricultural <input type="checkbox"/> Commercial <input type="checkbox"/> Ecological <input type="checkbox"/> Industrial <input type="checkbox"/> Military <input type="checkbox"/> Other Federal <input type="checkbox"/> Public Services <input type="checkbox"/> Recreational <input type="checkbox"/> Residential <input type="checkbox"/> Mixed Use	Types of Use <input type="checkbox"/> Agricultural <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Ecological <input type="checkbox"/> Industrial <input type="checkbox"/> Military <input type="checkbox"/> Other Federal <input type="checkbox"/> Public Services <input type="checkbox"/> Recreational <input type="checkbox"/> Residential <input type="checkbox"/> Mixed Use	Types of Use <input type="checkbox"/> Agricultural <input type="checkbox"/> Commercial <input type="checkbox"/> Ecological <input type="checkbox"/> Industrial <input type="checkbox"/> Military <input type="checkbox"/> Other Federal <input type="checkbox"/> Public Services <input type="checkbox"/> Recreational <input type="checkbox"/> Residential <input type="checkbox"/> Mixed Use	

Unit Conversions: 1 square foot = 0.000023 acre; 1 square meter = 0.0002471 acre

Current Land Use

Continued Use - A site or portion of a site which is currently being used in the same general manner as it was when the site became contaminated. For example, continued use would be an appropriate description for a property where industrial operations resulted in the contamination and the property is still used as an operating industrial facility. The RCRA Program will count all acres of an active RCRA industrial facility as Continued Use, except for parcels specifically designated as Reused or Planned Reuse.

Reused - A site or portion of a site where a new use, or uses, is occurring such that there has been a change in the type of use (e.g. industrial to commercial) or the property was vacant and now supports a specific use. This means that the developed site, or portion of the site, is "open" or actually being used by customers, visitors, employees, residents, etc.

Planned Reuse - A site or portion of a site where a plan for new use is in place. This could include conceptual plans, a contract with a developer, secured financing, approval by the local government, or the initiation of site redevelopment.

Unused - A site or portion of a site that is currently vacant or not being used in any identifiable manner. This could be because site investigation and cleanup are on-going, operations ceased or owner is in bankruptcy, or cleanup is complete but the site remains vacant.

Types of Use

Commercial Use – Commercial use refers to use for retail shops, grocery stores, offices, restaurants and other businesses.

Public Service Use – Public service use refers to use by a local or state government agency or a non-profit group to serve citizens' needs. This can include transportation services such as rail lines and bus depots, libraries and schools, government offices, public infrastructure such as roads, bridges, utilities or other services for the general public.

Agricultural Use – Agricultural uses refers to use for agricultural purposes, such as farmland for growing crops and pasture for livestock. It also can encompass other activities, such as orchards, agricultural research and development, and irrigating existing farmland.

Recreational Use – Recreational use refers to use for recreational activities, such as sports facilities, golf courses, ball fields, open space for hiking and picnicking, and other opportunities for indoor or outdoor leisure activities.

Ecological Use – Ecological use refers to areas where proactive measures, including a conservation easement, have been implemented to create, restore, protect or enhance a habitat for terrestrial and/or aquatic plants and animals, such as wildlife sanctuaries, nature preserves, meadows, and wetlands.

Industrial Use – Industrial use refers to traditional light and heavy industrial uses, such as processing and manufacturing products from raw materials, as well as fabrication, assembly, treatment, and packaging of finished products. Examples of industrial uses include factories, power plants, warehouses, waste disposal sites, landfill operations, and salvage yards.

Military Use – Military use refers to use for training, operations, research and development, weapons testing, range activities, logistical support, and/or provision of services to support military or national security purposes.

Other Federal Use – Other federal use refers to use to support the Federal government in federal agency operations, training, research, and/or provision of services for purposes other than national security or military.

Mixed Use – Mixed use refers to areas at which uses cannot be differentiated on the basis of acres. For example, a condominium with retail shops on the ground floor and residential use on the upper floors would fall into this category.

Residential Use – Residential use refers to use for residential purposes, including single-family homes, town homes, apartment complexes and condominiums, and child/elder care facilities.

TABLE

Table 1
Site Visit Participants
September 12, 2008
East Coast Chemical Disposal, Inc.
201 East Tenth Street
Marcus Hook, Pennsylvania 19061
USEPA ID PAD980706162

Person Onsite	Company Represented
Dinesh Rajkotia	PADEP 484-250-5738 drajkotia@state.pa.us
Camelia Draghiciu	PADEP 484-250-5743 cdraghiciu@state.pa.us
Bob Walls	Parts Exchange 610-485-6300
Brittany Austin	URS Corporation 717-632-7901 brittany_austin@urscorp.com
Scott Houser	URS Corporation 717-635-7901 scott_houser@urscorp.com

FIGURES



0 2000 4000
SCALE IN FEET



REFERENCE:
A Portion of USGS 7.5 Minute Topographic Map;
Marcus Hook Quadrangle, Pennsylvania; 1993.

SITE LOCATION MAP

East Coast Chemical Deposit, Inc.

URS

4507 NORTH FRONT STREET, SUITE 200
HARRISBURG, PENNSYLVANIA 17110
(717) 635-7901 FAX (717) 635-7902
www.urscorp.com

SCALE	AS SHOWN	DWN. BY	AWJ	JOB NO.	20497881
DATE	5/12/07	APP. BY		FIG. NO.	1

L:\OTAC PROJECTS\RCRA EIS\2008 EIS\206 East Coast Chemical Disposal 20497881\GIS\Figure 2 - Aerial.mxd



0 200 400 600 800 1,000 Feet



MARCUS HOOK BUSINESS
AND COMMERCE CENTER



FORMER EAST COAST CHEMICAL
DISPOSAL, INC. LOCATION

REFERENCE:

DVRPC 2005 DIGITAL ORTHOIMAGERY, DELAWARE VALLEY
REGIONAL PLANNING COMMISSION

TITLE

AERIAL PHOTOGRAPH OF SITE

PROJECT

EAST COAST CHEMICAL DISPOSAL, INC.
201 EAST TENTH STREET
MARCUS HOOK, PENNSYLVANIA 19061

URS

4507 NORTH FRONT STREET, SUITE 200
HARRISBURG, PENNSYLVANIA 17110
TEL (717) 635-7901 FAX (717) 635-7902
www.urscorp.com

SCALE

1" = 350'

DWN. BY

BAS

JOB NO.

20497881

DATE

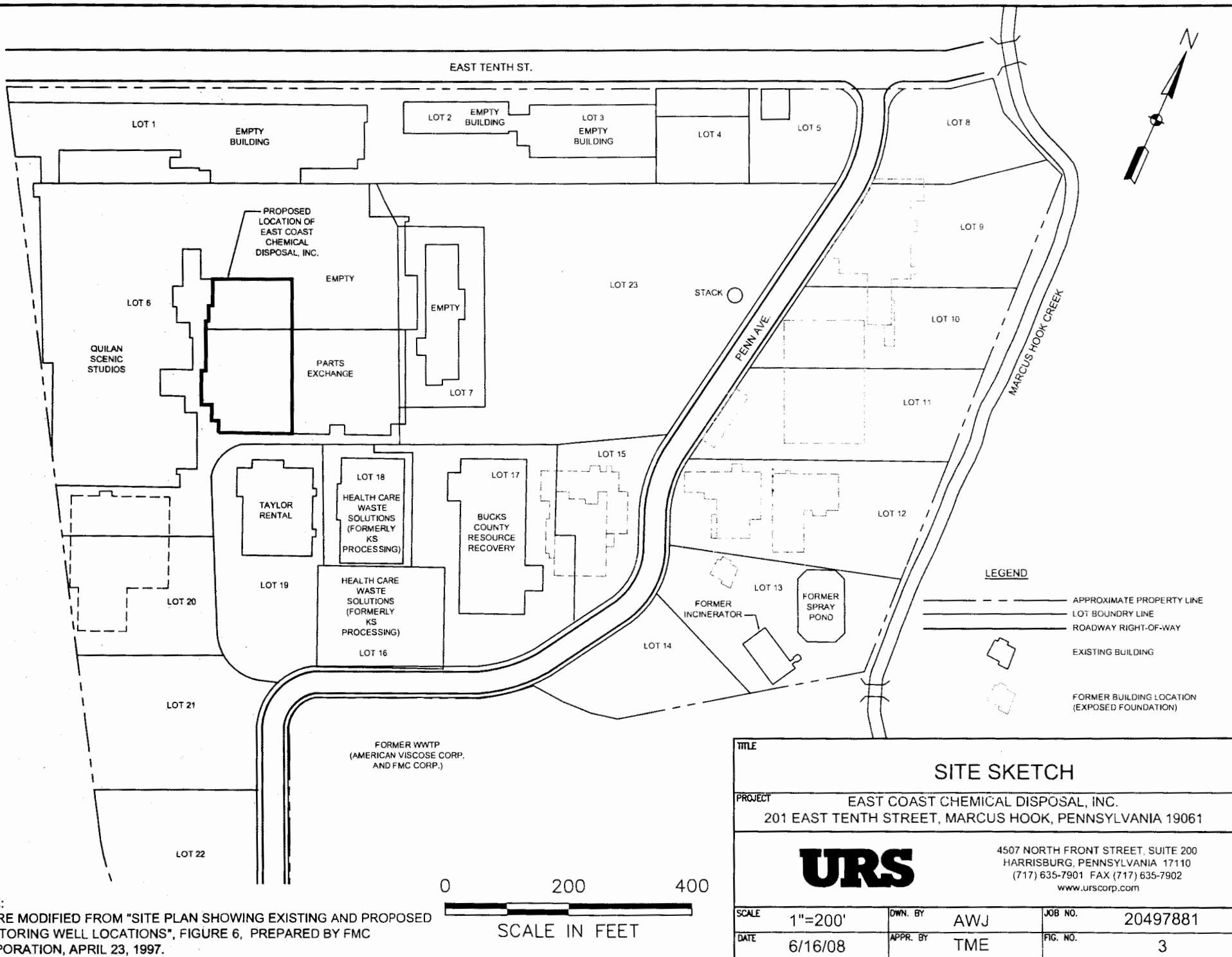
09/17/08

APPR. BY

SMH

FIG NO.

2



APPENDIX A

Inventory of Documentation and Electronic Library of PADEP Documents

APPENDIX A
INVENTORY OF DOCUMENTATION AND
ELECTRONIC LIBRARY OF PADEP DOCUMENTS
East Coast Chemical Disposal, Inc.
201 East Tenth Street
Marcus Hook, Pennsylvania 19061

1. **July 5, 1951:** Engineering Report – Industrial Waste Treatment, Marcus Hook, Pennsylvania – PADEP files
2. **July 9, 1951:** Letter from American Viscose Corporation to the Department of Health regarding the submission of a new application for waste treatment facilities – PADEP files
3. **November 15, 1957:** American Viscose Corporation Application no. 12252-in – PADEP files
4. **May 1, 1975:** File regarding FMC Corporation's industrial waste cooling tower – PADEP files
5. **December 16 – 18, 1975:** Compliance Monitoring Report regarding NPDES Permit No. PA0011126 – PADEP files
6. **December 15, 1981:** Hazardous Waste Permit Application – PADEP files
7. **December 15, 1981:** Hazardous Waste Permit Application – Part A – PADEP files
8. **December 22, 1981:** Letter from Municipal Environmental Associates, Inc. to USEPA regarding East Coast Chemical Disposal's Hazardous Waste Permit Application – PADEP files
9. **January 1982:** RCRA Permit Application for Hazardous Waste Part B – PADEP files
10. **March 10, 1982:** Letter from Municipal Environmental Associates, inc. to USEPA regarding East Coast Chemical Disposal, Inc Permit Application – PADEP files
11. **February 1982:** RCRA Permit Application for Hazardous Waste Part B – PADEP files
12. **April 23, 1982:** Letter of Transmittal – PADEP files
13. **May 2, 1982:** Letter of Transmittal – PADEP files
14. **May 5, 1982:** Hazardous Waste Permit Application – PADEP files
15. **May 15, 1982:** Draft Resource Conservation and Recovery Act Permit – PADEP files
16. **July 5, 1982:** Letter of Transmittal – PADEP files
17. **August 20, 1982:** Hazardous Waste Permit Application – PADEP files
18. **August 23, 1982:** Letter of Transmittal – PADEP files
19. **September 30, 1982:** Letter of Transmittal – PADEP files
20. **September 30, 1982:** Notification of Hazardous Waste Activity – PADEP files
21. **November 30, 1982:** Hazardous Waste Permit Application – USEPA files
22. **December 2, 1982:** Handwritten notice from USEPA indicating Part B Notice of Deficiency was sent to Facility - USEPA files
23. **January 21, 1983:** Letter from East Coast Chemical Disposal to USEPA stating Stanley Davis, Esq. has no objections to the facilities operations – PADEP files
24. **September 7, 1983:** NOV – PADEP files
25. **September 9, 1983:** NOV – PADEP files
26. **January 10, 1984:** Hazardous Waste Monitoring and Enforcement Log – PADEP files
27. **February 15, 1984:** Notice of Violation – PADEP files
28. **February 15, 1984:** Notice of Violation – PADEP files
29. **March 7, 1984:** East Coast Chemical Disposal, Inc. letter in regards to violations – PADEP files
30. **March 30, 1984:** Rates for radio stations in Philadelphia – USEPA files
31. **February 28, 1985:** Letter from PADER to East Coast Chemical Disposal regarding permit review

32. **March 21, 1985:** Letter from USEPA to East Coast Chemical Disposal stating Parts A and B are under review by USEPA and PADER – PADEP files
33. **April 3, 1985:** Application for permit for Solid Waste Disposal – Form/Phase 1 – PADEP files
34. **April 3, 1985:** Letter from Damex Corporation on behalf of K.S. Processing Company Inc. to the Bureau of Solid Waste forwarding the permit application for an incinerator installation – PADEP files
35. **April 3, 1985:** Letter from the Borough of Marcus Hook to K.S. Processing Company Inc. regarding application for conditional use of permit – PADEP files
36. **April 18, 1985:** Form no. 1 for permit 23-301-104 – PADEP files
37. **April 26, 1985:** Letter from PADER to K.S. Processing Company Inc. regarding applications 400527 and 23-301-104 – PADEP files
38. **May 28, 1985:** Letter from PADER to R.A.P.C.E. regarding application for the construction of an incinerator – PADEP files
39. **June 7, 1985:** Hazardous Waste Inspection Report – PADEP files
40. **July 23, 1985:** Letter from the USEPA to East Coast Chemical Disposal Inc. regarding RCRA Draft Permit – PADEP files
41. **July 30, 1985:** Radio Announcement – PADEP files
42. **August 1, 1985:** A joint notice of proposed issuance of a permit under the Resource Conservation and Recovery Act – PADEP files
43. **August 2, 1985:** Joint notice of proposed issuance of a permit under resource conservation and recovery act – PADEP files
44. **August 2, 1985:** Radio announcement regarding rates for announcements – PADEP files
45. **August 29, 1985:** Hazardous Waste Inspection Report – PADEP files
46. **September 20, 1985:** Solid Waste Permit – Phase II Narrative – PADEP files
47. **October 18, 1985:** Solid Waste Inspection Report – PADEP files
48. **November 14, 1985:** Letter from Borough of Marcus Hook to PADER about K.S. Processing Company Inc. regarding denial of interim status – PADEP files
49. **December 18, 1985:** Solid Waste Disposal – permit 400527 – no expiration date present – PADEP files
50. **December 18, 1985:** Letter from PADER to K.S. Processing Company Inc. regarding Pathological Waste Incinerator – PADEP files
51. **December 18, 1985:** Plan Approval and Temporary Permit for an incinerator – Expires March 31, 1986 – PADEP files
52. **January 8, 1986:** Resource Recovery Facility Inspection Report – PADEP files
53. **January 14, 1986:** Letter from K.S. Processing Company Inc. to PADER regarding permit 23-301-104 stating installation was complete as of January 10, 1986 – PADEP files
54. **February 21, 1986:** Chapter 127 Inspection Report – PADEP files
55. **March 3, 1986:** Letter from USEPA regarding contractor work – PADEP files
56. **March 7, 1986:** Letter to K.S. Processing Company Inc. employees stating the opacity monitor on the Model 480E incinerator was destroyed by fire due to strong winds – PADEP files
57. **March 13, 1986:** Inspection Report – PADEP files
58. **March 31, 1986:** Plan Approval and Temporary Permit 23-301-104 – PADEP files
59. **May 12, 1986:** Solid Waste Inspection Report – PADEP files
60. **May 16, 1986:** Preliminary Assessment Forms – PADEP files
61. **June 4, 1986:** Operating Permit for Ecolaire ECP Model 480E 23-301-104 – PADEP files
62. **August 25, 1986:** Solid Waste Inspection Report – PADEP files
63. **October 2, 1986:** Letter from Energy Resource Systems, Inc. to PADER regarding permit application for K.S. Processing Company Inc. incinerator – PADEP files
64. **October 29, 1986:** Solid Waste Inspection Report – PADEP files

65. **November 13, 1986:** Solid Waste Disposal Permit – no expired date present – PADEP files
66. **December 29, 1986:** Solid Waste Inspection Report and NOV – PADEP files
67. **December 30, 1986:** NOV – PADEP files
68. **January 14, 1987:** Letter to PADEP the East Coast Chemical Disposal, Inc. regarding December 29, 1986 NOV – PADEP files
69. **February 27, 1987:** Solid Waste Inspection Report – PADEP files
70. **March 5, 1987:** Notice of Preparation for the denial of Hazardous Waste Treatment and Storage Facility Permit – PADEP files
71. **June 1, 1987:** Letter from PADER to Mr. Louis Maslow regarding Part B Application for East Coast Chemical Disposal – PADEP files
72. **September 22, 1987:** Solid Waste Inspection Report – PADEP files
73. **February 26, 1988:** Air Quality Inspection Report – USEPA files
74. **March 23, 1988:** Operating Permit for Model ERS-77/2 – expires March 31, 1988
75. **April 4, 1988:** NOV – PADEP files
76. **April 11, 1988:** Letter regarding regulations – PADEP files
77. **May 13, 1988:** NOV – PADEP files
78. **May 26, 1988:** Letter from PADER to Marcus Hook Commerce Center regarding the on-site solvent storage tank farm – PADEP files
79. **July 6, 1988:** Resource Recovery Facility Inspection Report – PADEP files
80. **July 20, 1988:** Notice stating East Coast Chemical Disposal is in the process of closure – PADEP files
81. **August 8, 1988:** NOV – PADEP files
82. **August 31, 1988:** Resource Recovery Facility Inspection Report – PADEP files
83. **October 6, 1988:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
84. **November 11, 1988:** Non sampling site reconnaissance summary report – PADEP files
85. **January 13, 1989:** NOV – PADEP files
86. **January 14, 1989:** NOV – PADEP files
87. **January 18, 1989:** Letter from PADER to K.S. Processing Company Inc. regarding the new ECP Model 1000TE Incinerator – PADEP files
88. **June 12, 1984:** Waste Disposal Report and Information – PADEP files
89. **June 14, 1989:** Letter from American Resource Consultants, Inc. to PADER regarding receipt of K.S. Processing Company, Inc.'s permit application – PADEP files
90. **June 21, 1989:** Letter from PADER to American Resource Consultants regarding specific wastes produced under permit 23-301-112A – PADEP files
91. **July 14, 1989:** Letter from K.S. Processing Company Inc. regarding the Municipal Waste Permit Application – PADEP files
92. **August 28, 1989:** Letter from Bureau of Air Quality Control to PADER regarding K.S. Processing Company Inc. – PADEP files
93. **August 30, 1989:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
94. **September 15, 1989:** NOV – PADEP files
95. **October 18, 1989:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
96. **December 15, 1989:** Solid waste disposal and/or processing Permit – PADEP files
97. **December 15, 1989:** Plan approval – PADEP files
98. **January 2, 1990:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
99. **January 11, 1990:** NOV – PADEP files

100. **February 13, 1990:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
101. **February 1990:** Preliminary assessment – PADEP files
102. **March 8, 1990:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
103. **March 27, 1990:** Chapter 127 Inspection Report
104. **April 4, 1990:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
105. **May 16, 1990:** Letter regarding waste permit – PADEP files
106. **May 18, 1990:** Letter regarding waste permit – PADEP files
107. **May 31, 1990:** Preliminary Assessment report conducted by NUS Corporation – PADEP files
108. **June 5, 1990:** Storage tank registration – PADEP files
109. **June 6, 1990:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
110. **June 12, 1990:** Solid waste disposal report – PADEP files
111. **July 17, 1990:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
112. **August 3, 1990:** Letter from PADER to K.S. Processing Company Inc. regarding Municipal Waste Processing Permit – PADEP files
113. **August 3, 1990:** Solid Waste Disposal Permit – expires August 3, 2000 – PADEP files
114. **August 13, 1990:** Letter from PADER to K.S. processing regarding permit 400527 – PADEP files
115. **November 6, 1990:** Letter regarding permit – PADEP files
116. **November 30, 1990:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
117. **January 10, 1991:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
118. **February 7, 1991:** Letter from PADER to K.S. Processing Company Inc. regarding dismantlement of incinerator covered by permit 23-301-104
119. **February 11, 1991:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
120. **March 4, 1991:** Letter regarding shut down of incinerator – PADEP files
121. **March 5, 1991:** NOV – PADEP files
122. **March 19, 1991:** NOV – PADEP files
123. **March 22 1991:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
124. **March 26, 1991:** Letter from PADER to K.S. Processing Company Inc. regarding permit 400557
125. **April 25 1991:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
126. **April 26, 1991:** Work plan for removal action – PADEP files
127. **April 30, 1991:** Letter from PADER to K.S. Processing Company, Inc. regarding the expiration of permit 400557
128. **May 3, 1991:** Letter regarding NOV on March 5, 2008 – PADEP files
129. **May 29, 1991:** Resource Recovery Facility Inspection Report – PADEP files
130. **May 30, 1991:** NOV – PADEP files
131. **June 13, 1991:** Resource Recovery Facility Inspection Report – PADEP files
132. **June 24, 1991:** Plan Approval and Temporary permit 23-301-104 – PADEP files
133. **July 5, 1991:** Letter from PADER to K.S. Processing Company Inc. regarding June 17, 1991 letter regarding permit 101549 – PADEP files
134. **July 12, 1991:** Letter from PADER to K.S. Processing Company, Inc. regarding excess visible emissions – PADEP files
135. **July 31, 1991:** Resource Recovery Facility Inspection Report – PADEP files
136. **August 20, 1991:** Resource Recovery Facility Inspection Report – PADEP and USEPA files

137. **August 31, 1991:** Resource Recovery and other Processing Facilities Annual Operation Report
138. **September 9, 1991:** Type six Facility Inspection Report – PADEP files
139. **September 16, 1991:** Inspection Report/Data Entry – PADEP and USEPA files
140. **September 21, 1991:** Inspection Report – Resource Recovery Facility
141. **September 25, 1991:** Type six Facility Inspection Report – PADEP files
142. **October 4, 1991:** NOV – PADEP files
143. **October 30, 1991** Resource Recovery Facility Inspection Report – PADEP and USEPA files
144. **November 27, 1991:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
145. **December 23, 1991:** Resource Recovery Facility Inspection Report – PADEP files
146. **January 17, 1992:** NOV – PADEP files
147. **January 31, 1992** Letter from PADER to K.S. processing Company, Inc. regarding permit 400557 – PADEP files
148. **February 12, 1992:** Temporary operating permit for an incinerator – PADEP files
149. **March 4, 1992:** Report regarding actions taken during clean up – PADEP files
150. **April 1, 1992:** Letter regarding annual report – PADEP files
151. **May 1992:** PCB Cleanup Assessment Report – PADEP files
152. **June 22, 1992:** Resource Recovery Facility Inspection Report – PADEP files
153. **June 24, 1992:** Temporary operating permit for an incinerator – PADEP files
154. **July 7, 1992:** Letter regarding annual report – PADEP files
155. **July 19, 1992:** Infectious and Chemotherapeutic Waste Manifest – USEPA files
156. **July 27, 1992:** NOV – PADEP files
157. **July 29, 1992:** Infectious and Chemotherapeutic Waste Manifest – USEPA files
158. **July 29, 1992:** Schedule for annual reports – PADEP files
159. **July 30, 1992:** Resource Recovery Facility Inspection Report – PADEP files
160. **August 2, 1992:** Resource Recovery Facility Inspection Report – PADEP files
161. **August 7, 1992:** Annual report questions response – PADEP files
162. **August 7, 1992:** NOV – PADEP files
163. **August 31, 1992:** Resource Conservation and Recovery Act Operation Report – PADEP files
164. **September 1992:** Letter from American Research Consultants to the Delaware County Commissioners solid waste permit renewal for K.S. Processing Company, Inc. – USEPA files
165. **September 10, 1992:** Inspection Report – Resource Recovery Facility– USEPA files
166. **September 10, 1992:** PADER Operating Permit for Incinerator – USEPA files
167. **September 10, 1992:** Letter from PADER to K.S. Processing regarding permit application submission before the expired date – PADEP files
168. **September 11, 1992:** Resource Recovery Facility Inspection Report – PADEP files
169. **September 18, 1992:** Letter from American Resource Consultants, Inc. to Delaware County Commissioners regarding the permit renewal for K.S. Processing Company, Inc.
September 1992: Letter from American Research Consultants to the Delaware County Commissioners solid waste permit renewal for K.S. Processing Company, Inc. – PADEP files
170. **September 21, 1992:** Letter from American Resource Consultants, Inc. to K.S. Processing Company, Inc regarding a notice of permit renewal application – PADEP files
171. **September 28, 1992:** Formal Industrial Site Inspection – PADEP files
172. **September 30, 1992:** Letter from American Resource Consultants, Inc to PADER regarding submittal for renewal of permit 400557 – PADEP files

173. **October 9, 1992:** Letter to K.S. Processing Company, Inc from PADER regarding checklist review of the municipal waste incinerator application – PADEP files
174. **October 15, 1992:** NOV – PADEP files
175. **October 15, 1992:** NOV – PADEP files
176. **October 20, 1992:** Resource Recovery Facility Inspection Report – PADEP files
177. **October 21, 1992:** Letter from PADER to K.S. Processing Company regarding type 6 storage – PADEP files
178. **October 22, 1992:** Letter from American Resource Consultants, Inc. to PADER regarding municipal waste permit renewal application – PADEP files
179. **October 22, 1992:** Letter from PADER to K.S. Processing regarding the review of the waste management permit renewal – PADEP files
180. **October 27, 1992:** Letter to K.S. Processing Company, Inc from PADER regarding checklist review of the municipal waste incinerator application – PADEP files
181. **October 28, 1992:** File regarding meeting between solid waste specialist Walter Payne and K.S. Processing Company, Inc – PADEP files
182. **November 2, 1992:** NOV – PADEP files
183. **November 19, 1992:** Resource Recovery Facility Inspection Report – PADEP files
184. **November 24, 1992:** Resource Recovery Facility Inspection Report – PADEP files
185. **December 4, 1992:** Letter from PADER to K.S Processing Company, Inc. acknowledging the receipt of application number 400557 – PADEP files
186. **December 15, 1992:** Letter from American Resource Consultants, inc to PADER regarding the municipal waste permit application – PADEP files
187. **December 18, 1992:** Resource Recovery Facility Inspection Report – PADEP files
188. **December 18, 1992:** Compliance Order – PADEP files, PDF not available
189. **December 21, 1992:** Letter from PADER to K.S. Processing Company, Inc. regarding air quality permit violations on September 11, 1992 – PADEP files
190. **December 22, 1992:** Compliance Order – PADEP files
191. **January 1, 1993:** Type 4 Incinerator Inspections Report – PADEP files
192. **January 5, 1993:** NOV – PADEP files
193. **January 6, 1993:** Letter from PADER to K.S. Processing regarding repeat violations on permits 101554, 400557, 400596, and suggested action – PADEP files
194. **January 8, 1993:** Letter from PADER to K.S. Processing regarding repeat violations on permits 101554, 400557, 400595, and the suggested actions – PADEP files
195. **January 26, 1993:** Resource Recovery Facility Inspection Report – PADEP files
196. **February 5, 1993:** Letter from PADER to K.S. Processing acknowledging the completion of a permit application – PADEP files
197. **February 17, 1993:** Resource Recovery Facility Inspection Report – PADEP and USEPA files
198. **March 4, 1993:** Annual operation Report – PADEP files
199. **March 9, 1993:** Resource Recovery Facility Inspection Report – PADEP files
200. **March 9, 1993:** Infectious/Chemotherapeutic Waste Inspection Report – PADEP files
201. **March 17, 1993:** NOV – PADEP files
202. **March 26, 1993:** Letter from K.S. Processing Company, Inc to Walter Payne (waste specialist) regarding corrections to be made to comply with PADER regulations – PADEP files
203. **March 30, 1993:** Letter from PADER to K.S. Processing Company, Inc. regarding the review of permit 400557 – PADEP files
204. **April 5, 1993:** Letter from the Borough of Marcus Hook to K. S. Processing regarding air quality permit 23-301-108 – PADEP files
205. **April 8, 1993:** Annual Inspection – PADEP files
206. **April 30, 1993:** Resource Recovery Facility Inspection Report – PADEP files

- 207. **May 4, 1994:** Resource Recovery Facility Inspection Report – PADEP files
- 208. **May 14, 1993:** Resource Recovery Facility Inspection Report – PADEP files
- 209. **May 18, 1993:** Letter from International Environmental Services, inc. to K.S. Processing Company, Inc. regarding the salt waste incident – PADEP files
- 210. **May 21, 1993:** Letter from American Resource Consultants to PADER in response to comments regarding permit 400557 renewal application – PADEP files
- 211. **May 25, 1993:** NOV – PADEP files
- 212. **May 28, 1993:** NOV – PADEP files
- 213. **June 8, 1993:** Letter from Michael J. Rutenberg (Attorney at Law) to PADER regarding a May 14, 1993 inspection – PADEP files
- 214. **June 9, 1993:** PADER letter of guidance for new Regulations, and the Final Hazard Ranking System report conducted by Halliburton NUS Corporation – PADEP files
- 215. **June 15, 1993:** Order and Assessment of Civil Penalties – PADEP files
- 216. **June 15, 1993:** Incident Notification Report – PADEP files
- 217. **June 17, 1993:** Infectious and Chemotherapeutic Waste manifest – PADEP files
- 218. **June 24, 1993:** Notice of Cancellation
- 219. **July 7, 1993:** Final Hazard Ranking System, East Tenth Street prepared by NUS Corporation - PADEP files
- 220. **July 13, 1993:** Letter from PADER to the PSFS Building regarding permit 23-301-108 – PADEP files
- 221. **September 1, 1993:** Modifications to type 4 incinerator operations written by American Resource Consultants – PADEP files
- 222. **September 30, 1993:** Infectious and Chemotherapeutic Waste Manifest – PADEP files
- 223. **October 13, 1993:** Infectious and Chemotherapeutic Waste Manifest – PADEP files
- 224. **November 8, 1993:** NOV – PADEP files
- 225. **December 6, 1993:** Type 4 Incinerator Inspection Report – PADEP files
- 226. **January 28, 1994:** Resource Recovery Facility Inspection Report – PADEP files
- 227. **February 2, 1994:** Resource Recovery Facility Inspection Report – PADEP files
- 228. **March 2, 1994:** NOV – PADEP files
- 229. **March 11, 1994:** Resource Recovery Facility Inspection Report – PADEP files
- 230. **July 31, 1995:** Hazardous Waste Inspection Report, TSD Facilities - Part A - PADEP files
- 231. **January 15, 1996:** Final Summary Report of Remedial Actions – PADEP files
- 232. **March 29, 1996:** Consent Order and Agreement – PADEP files
- 233. **July 18, 1996:** Report of payment – PADEP files
- 234. **November 12, 1996:** NOV – PADEP files
- 235. **November 14, 1996:** NOV – PADEP files
- 236. **March 4, 1997:** meeting log – PADEP files
- 237. **March 7, 1997:** Phase II Work Plan – USEPA files
- 238. **April 4, 1997:** Letter regarding penalties – PADEP files
- 239. **March 1998:** A Phased Investigation – PADEP files
- 240. **March 6, 1998:** Letter from PADEP to K.S. Processing Company, Inc. regarding permit 400557 – PADEP files
- 241. **July 10, 2000:** Work plan for interim response services – PADEP files
- 242. **August 10, 2000:** Final Building Reconnaissance Report: Foster Wheeler Environmental Corporation – PADEP files
- 243. **June 21, 2002:** Final Phase I Site Investigation report: Foster Wheeler Environmental Corporation – PADEP files
- 244. **January 7, 2003:** Letter regarding prospect purchaser agreement – PADEP files
- 245. **June 23, 2003:** Consent order and agreement – PADEP files
- 246. **October 31, 2003:** Interim Status Report – PADEP files
- 247. **December 31, 2003:** Interim Status Report – PADEP files

- 248. **February 23, 2004:** Phase II Site Investigation Work Plan – PADEP files
- 249. **February 27 2004:** Interim Status Report – PADEP files
- 250. **March 11, 2004:** Phase II Site Investigation – PADEP files
- 251. **July 28, 2004:** Interim Status Report – PADEP files
- 252. **August 2, 2004:** Interim Status Report – PADEP files
- 253. **August 24, 2004:** Interim Status Report – PADEP files
- 254. **September 27, 2004:** Interim Status Report – PADEP files
- 255. **November 29, 2004:** Interim Status Report – PADEP files
- 256. **January 18, 2005:** Interim Status Report – PADEP files
- 257. **June 1, 2005:** Interim Status Report – PADEP files
- 258. **December 5, 2005:** Interim Status Report – PADEP files
- 259. **January 16, 2006:** Letter from PADEP to FMC Corporation regarding consent order and agreement – PADEP files
- 260. **February 1, 2006:** Interim Response Final Report East 10th St. HSCA Site – PADEP files
- 261. **February 8, 2006:** Interim Status Report – 1 November through December 31, 2005 – PADEP files
- 262. **April 13, 2006:** Interim Status report: 1 January through 28 February 2006 – PADEP files
- 263. **May 17, 2006:** Letter from PADEP to FMC Corporation regarding consent order and agreement – PADEP files
- 264. **July 17, 2006:** Interim Status Report: 1 March through 30 June 2006 – PADEP files
- 265. **September 29, 2006:** Interim Status Report: 1 July through 31 August 2006 – PADEP files
- 266. **November 30, 2006:** Interim Status Report: 1 September through 31 October 2006 – PADEP files
- 267. **January 31, 2007:** Interim Status Report: 1 November through 30 December 2006
- 268. **March 30, 2007:** Interim Status Report: 1 January through 28 February 2007 – PADEP files
- 269. **May 31, 2007:** Interim Status Report – PADEP files
- 270. **November 30, 2007:** Letter regarding Draft Phase II Site Investigation Report – PADEP files
- 271. **December 5, 2007:** Consent Order and Agreement – PADEP files
- 272. **March 6, 2008:** Letter from Environmental Research Management to Marcus Hook Borough manager regarding sampling activities for the east 10th St HSCA Site – PADEP files
- 273. **April 11, 2008:** Letter from the PADEP to East Coast Chemical Disposal (No Longer on-site) informing of an upcoming site visit – PADEP files
- 274. **No Date:** Operating plan to incinerate scintillation vial waste – Solid Waste Permit 400459 and Air Quality Permit 46-301-225 – PADEP files
- 275. **No Date:** Fact Sheet for Draft Report developed for the draft Resource Conservation and Recovery Act Permit – PADEP files

APPENDIX B

Site Photographic Log



SITE PHOTOGRAPHIC LOG

Client Name:

Pennsylvania Department of
Environmental Protection

Site Location:

East Coast Chemical Disposal, Inc.
201 East Tenth Street
Marcus Hook, Pennsylvania 19061

Project No.

20497881

Photo No.

1

Date:

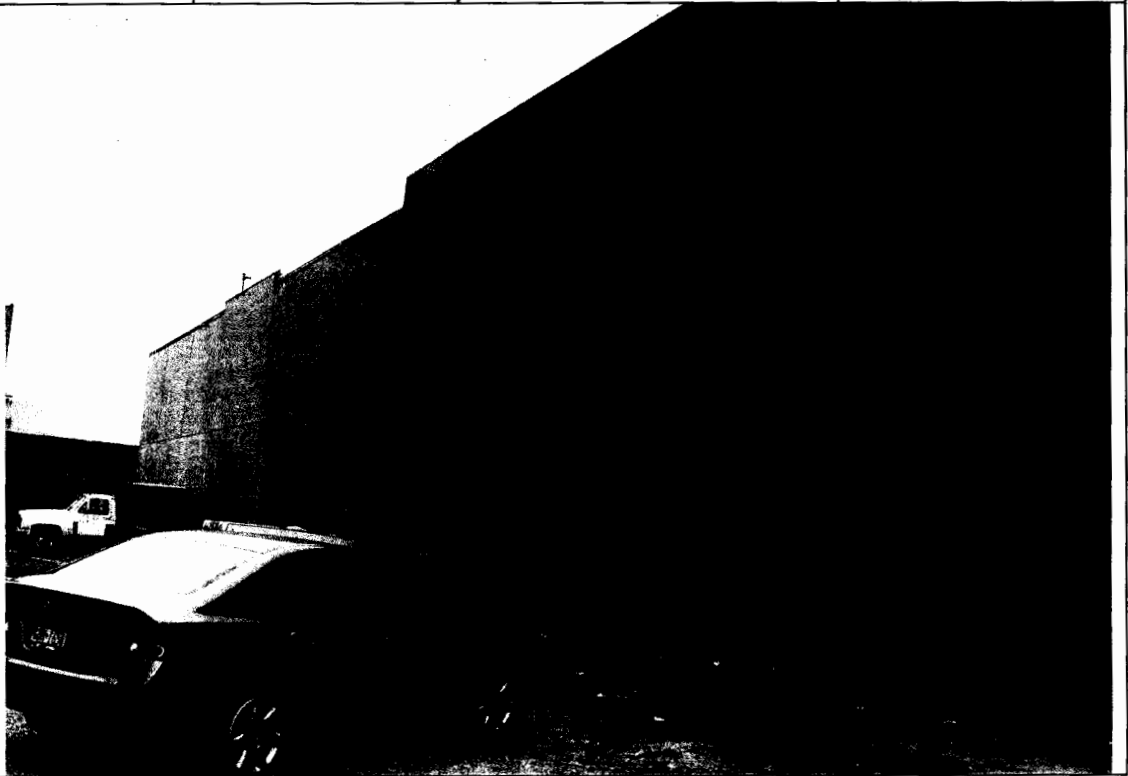
9/12/08

**Direction Photo
Taken:**

Southwest

Description:

Exterior view of the east
side of Building 6B -
former proposed location
of East Coast Chemical
Disposal, Inc.

**Photo No.**

2

Date:

9/12/08

**Direction Photo
Taken:**

North

Description:

Exterior view of the east
side of Building 6B -
former proposed location
of East Coast Chemical
Disposal, Inc.





SITE PHOTOGRAPHIC LOG

Client Name:

Pennsylvania Department of
Environmental Protection

Site Location:

East Coast Chemical Disposal, Inc.
201 East Tenth Street
Marcus Hook, Pennsylvania 19061

Project No.

20497881

Photo No.

3

Date:

9/12/08

**Direction Photo
Taken:**

West

Description:

Exterior view of the south
side of Building 6B -
former proposed location
of East Coast Chemical
Disposal, Inc.

**Photo No.**

4

Date:

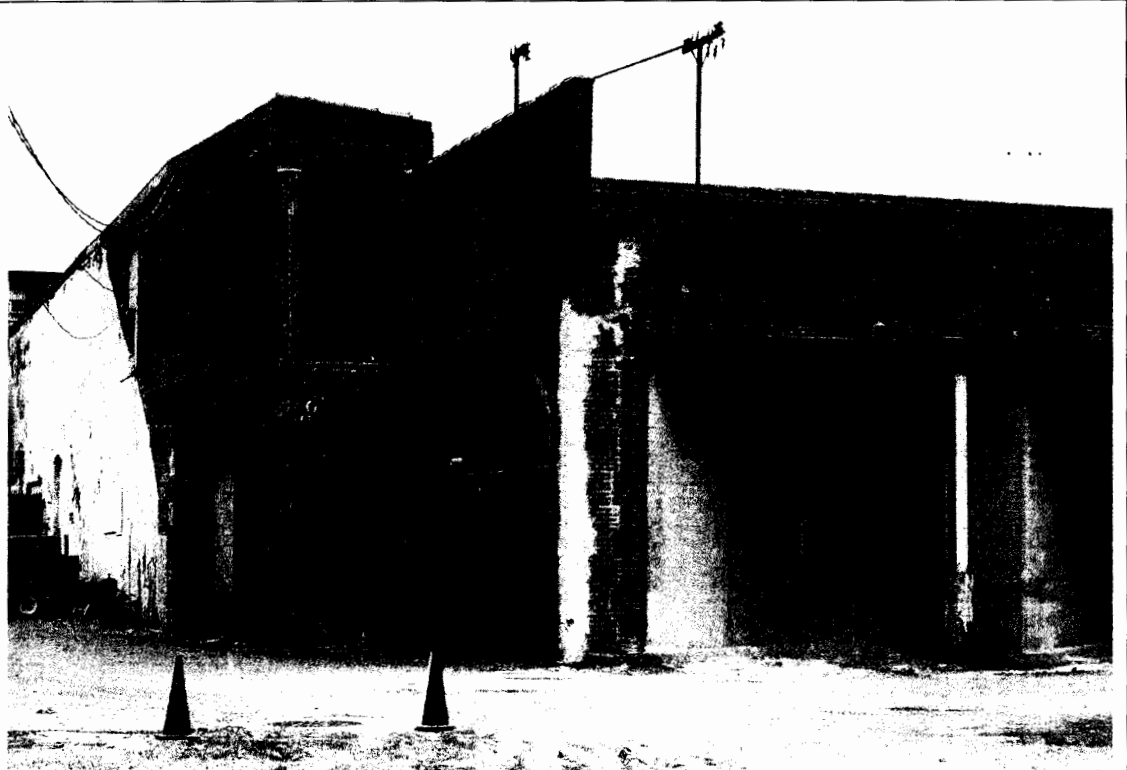
9/12/08

**Direction Photo
Taken:**

Northeast

Description:

Exterior view of the south
side of Building 6B -
former proposed location
of East Coast Chemical
Disposal, Inc.





SITE PHOTOGRAPHIC LOG


Client Name: Pennsylvania Department of Environmental Protection		Site Location: East Coast Chemical Disposal, Inc. 201 East Tenth Street Marcus Hook, Pennsylvania 19061	Project No. 20497881
Photo No. 5	Date: 9/12/08		
Direction Photo Taken: N/A			
Description: Interior view of Building 6B - former proposed location of East Coast Chemical Disposal, Inc.			

Photo No. 6	Date: 9/12/08	
Direction Photo Taken: N/A		
Description: Interior view of Building 6B - former proposed location of East Coast Chemical Disposal, Inc.		



LETTER OF TRANSMITTAL

Date: November 5, 2009

TO: PADEP – SERO
Waste Management Program
2 East Main Street
Norristown, PA 19401-4915

FROM: Rebecca Herr

URS Corporation
4507 N Front St, Suite 200
Harrisburg, PA 17110

Attention: Mr. Dinesh Rajkotia
JOB No.: 20497882.02070

RE: ENVIRONMENTAL INDICATOR INSPECTION REPORT –
EAST COAST CHEMICAL DISPOSAL CORPORATION – GTAC 4-
0-286

The following items are being sent:

☒ Attached ☐ Under separate cover by
☐ Shop Drawings ☐ Prints ☐ Plans ☐ Samples ☐ Specifications ☐ Copy of Letter
☐ Other

Item	Copies	Date	Description
1	2	November 2009	Final EI Report and Checklists – Hard copies and CDs of non-USEPA documents listed in Appendix A
1	2	November 2009	CDs of Complete Final EI Report, GW Checklist, HH Checklist, Use Form RCRA in pdf format with supporting word, powerpoint, and excel files

Transmittals for reasons checked:

<input type="checkbox"/> For Your Approval	<input type="checkbox"/> No Exceptions Taken	<input type="checkbox"/> Resubmit
<input checked="" type="checkbox"/> For Your Use	<input type="checkbox"/> Make Corrections Noted	<input type="checkbox"/> Submit
<input type="checkbox"/> As Requested	<input type="checkbox"/> Amend and Resubmit	<input type="checkbox"/> Return
<input type="checkbox"/> For Review and Comment		<input type="checkbox"/>

copies for approval
copies for distribution
corrected prints

Remarks:

Per your 09/29/09 email, PADEP SERO had one comment to the draft report submitted on 08/20/09. Per Griff Miller's (USEPA) 09/02/09 email there were no comments on the draft. Enclosed hard copies and CDs of non-USEPA documents in Appendix A represent the final version of this EI report.

Copies: Mr. Walt Harner, PADEP Central Office (electronic files on CD only, no hard copy)

If enclosures are not as noted, kindly notify us at once.

Name: Rebecca Herr

URS Corporation
Harrisburg, PA 17110

RECEIVED
09 NOV -6 AM 10:48
ECP/MS-SE
OFFICE
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DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name: East Coast Chemical Disposal, Inc.
Facility Address: 201 East Tenth Street, Marcus Hook, PA 19061
Facility EPA ID #: PAD980706162

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

 X If yes - check here and continue with #2 below.
 If no - re-evaluate existing data, or
 If data are not available skip to #8 and enter "IN" (more information needed) status code

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Controls" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program, the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993 (GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated groundwater and contaminants within groundwater (e.g., non aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

2. Is groundwater known or reasonably suspected to be "contaminated"¹ above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action anywhere at, or from, the facility?

_____ If yes – continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.
 X If no – skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."
_____ If unknown (for any media) – skip to #8 and enter "IN" status code.

Rationale and Reference(s):

According to USEPA and PADEP documentation, in 1983, the Facility applied for a hazardous waste permit to construct a commercial container storage and treatment facility in Building 6B located at 201 East Tenth Street, Marcus Hook, Pennsylvania. Building 6B is located on a 2-acre parcel (Lot 6) that is part of the 40-acre subdivided 201 East Tenth Street property. The Facility intended to lease Building 6B if their hazardous waste permit was approved; however, the permit was ultimately denied and the Facility never operated onsite. The entire 40-acre property was proposed to the USEPA NPL in January 1994 and has been the focus of numerous State-led site investigations and remedial activities (known as the East Tenth Street HSCA Site). Cleanup of soil and groundwater, as well as surface water and sediment of nearby Marcus Hook Creek, is ongoing. However, because the Facility never operated at the property, it has not contributed to the contamination identified at the site and no further follow-up actions are required.

¹"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

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3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"¹ as defined by the monitoring locations designated at the time of this determination)?

- _____ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"²)
- _____ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"²) - skip to #8 and enter "NO" status code, after providing an explanation.
- _____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

No rationale warranted.

¹ "Existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

**Migration of Contaminated Groundwater Under Control
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4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

- _____ If yes - continue after identifying potentially affected surface water bodies.
- _____ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.
- _____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

No rationale warranted.

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5. Is the **discharge** of "contaminated" groundwater into surface water likely to be "**insignificant**" (i.e., the maximum concentration² of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

_____ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration³ of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgment/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

_____ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations³ greater than 100 times their appropriate "level(s)," and if estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

_____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

No rationale warranted.

² As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

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6. Can the **discharge** of "contaminated" groundwater into surface water be shown to be "**currently acceptable**" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented³)?

_____ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment⁴ appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

_____ If no - (the discharge of "contaminated" groundwater can not be shown to be "**currently acceptable**") – skip to #8 and enter a "NO" status, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

_____ If unknown – skip to 8 and enter "IN" status code.

Rationale and Reference(s):

No rationale warranted.

³ Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

⁴ The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

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7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected **in the future** to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

_____ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

_____ If no - enter "NO" status code in #8.

_____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

No rationale warranted.

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

_____ YE – Yes, "Migration of contaminated Groundwater Under Control" has been verified.

 X NO – Unacceptable migration of contaminated groundwater is observed or expected.

_____ IN – More information is needed to make a determination.

Completed by: Dinesh P. Rajkotia Date 11/16/2009
Dinesh P. Rajkotia
Environmental Engineer

Supervisor: Mohamad M. Mazid Date 11/16/2009
Mohamad M. Mazid
Chief, Engineering Services Section
PADEP, SERO

Locations where References may be found:

USEPA documents referenced herein can be found at USEPA's Region III office in Philadelphia, PA. PADEP files obtained from the Southeast Regional Office (SERO) in Norristown, PA are provided in pdf format on compact disc in Appendix A of the EI Report completed for the Site (URS, August 2009). Additional documents may be located at the PADEP SERO.

Contact telephone and e-mail numbers:

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MIGRATION OF CONTAMINATED GROUNDWATER UNDER CONTROL (CA 750)

Level

1

2

3

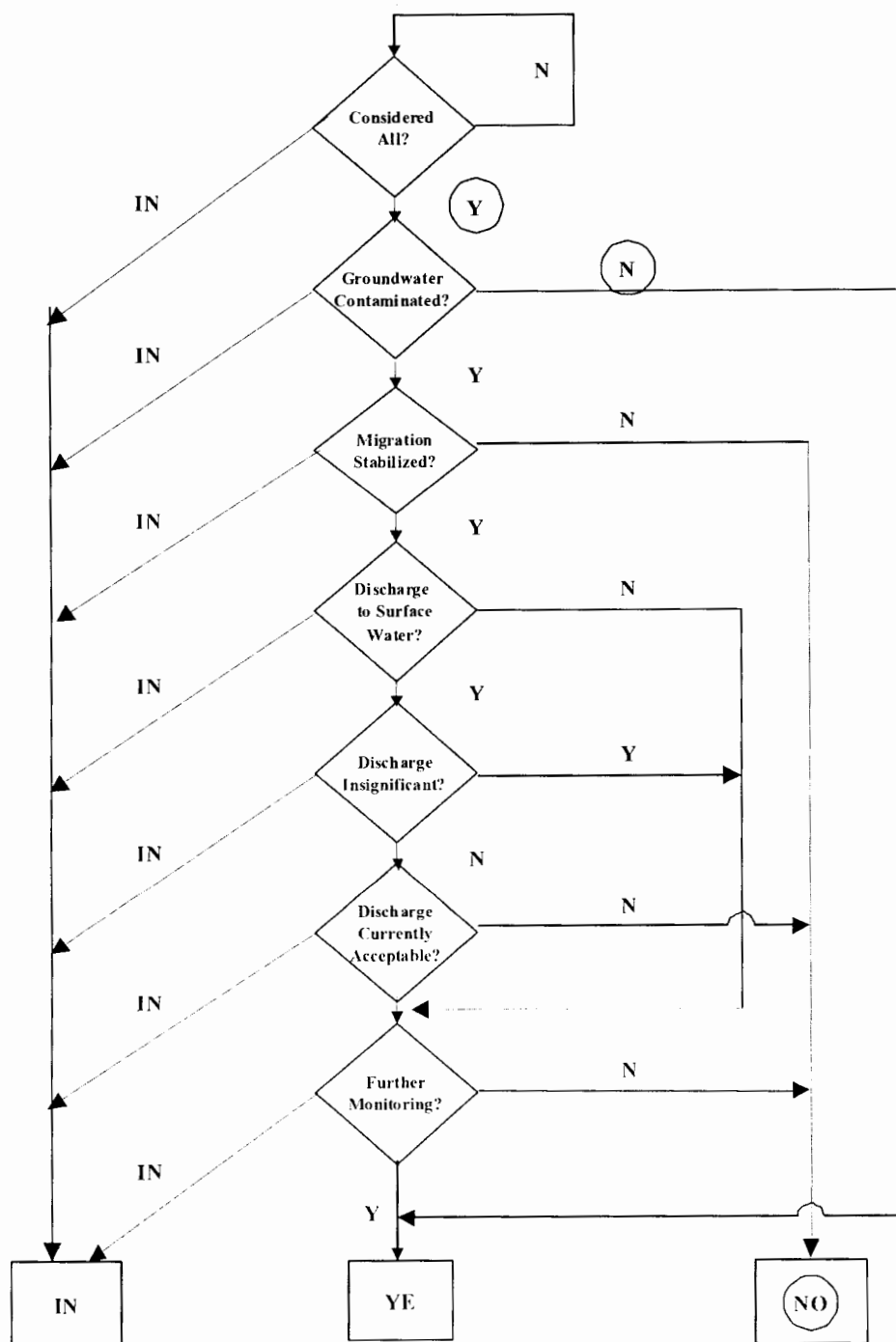
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5

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7

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DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name: East Coast Chemical Disposal, Inc.
Facility Address: 201 E. Tenth St. Marcus Hook, PA 19061
Facility EPA ID #: PAD980706162

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

 X If yes – check here and continue with #2 below.
 If no – re-evaluate existing data, or
 If data are not available skip to #6 and enter "IN" (more information needed) status code

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Controls" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program, the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993 (GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

2. Are groundwater, soil, surface water, sediments, or air media known or reasonably suspected to be "contaminated"¹ above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale/Key Contaminants</u>
Groundwater		X		See rationale below.
Air (indoors) ²		X		See rationale below.
Surface Soil (e.g., <2 ft)		X		See rationale below.
Surface Water		X		See rationale below.
Sediment		X		See rationale below.
Subsurface Soil (e.g., >2 ft)		X		See rationale below.
Air (outdoors)		X		See rationale below.

- X If no (for all media) – skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient support documentation demonstrating that these "levels" are not exceeded.
- If yes (for any media) – continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.
- If unknown (for any media) – skip to #6 and enter "IN" status code.

Rationale and Reference(s):

According to USEPA and PADEP documentation, in 1983, the Facility applied for a hazardous waste permit to construct a commercial container storage and treatment facility in Building 6B located at 201 East Tenth Street, Marcus Hook, Pennsylvania. Building 6B is located on a 2-acre parcel (Lot 6) that is part of the 40-acre subdivided 201 East Tenth Street property. The Facility intended to lease Building 6B if their hazardous waste permit was approved; however, the permit was ultimately denied and the Facility never operated onsite. The entire 40-acre property was proposed to the USEPA NPL in January 1994 and has been the focus of numerous State-led site investigations and remedial activities (known as the East Tenth Street HSCA Site). Cleanup of soil and groundwater, as well as surface water and sediment of nearby Marcus Hook Creek, is ongoing. However, because the Facility never operated at the property, it has not contributed to the contamination identified at the site and no further follow-up actions are required.

¹ "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

² Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

3. Are there complete pathways between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential Human Receptors (Under Current Conditions)

"Contaminated Media"	Residents	Workers	Daycare	Construction	Trespassers	Recreation	Food³
Groundwater							
Air (indoors)							
Soil (surface, e.g., <2 ft)							
Surface Water							
Sediment							
Soil (subsurface e.g., >2 ft)							
Air (outdoors)							

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strikeout specific Media including Human Receptors -- spaces for Media, which are not "contaminated" as identified in #2 above.
2. Enter "yes" or "no" for potential "completeness" under each "Contaminated" Media – Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations, some potential "Contaminated" Media – Human Receptor combinations (Pathways) do not have check spaces ("_____"). While these combinations may not be probable in most situations, they may be possible in some settings and should be added as necessary.

- _____ If no (pathways are not complete for any contaminated media –receptor combination) – skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet) to analyze major pathways.
- _____ If yes (pathways are complete for any "Contaminated" Media – Human Receptor combination) – continue after providing supporting explanation.
- _____ If unknown (for any "Contaminated" Media – Human Receptor combination) – skip to #6 and enter "IN" status code.

Rationale and Reference(s):

No rationale warranted.

³ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant"** (i.e., potentially⁴ "unacceptable" levels) because exposures can be reasonably expected to be:
- 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

_____ If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) – skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_____ If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) – continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_____ If unknown (for any complete pathway) – skip to #6 and enter "IN" status code.

Rationale and Reference(s):

No rationale warranted.

⁴ If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a Human Health Risk Assessment specialist with appropriate education, training and experience.

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

5. Can the "significant" exposures (identified in #4) be shown to be within **acceptable** limits?

- _____ If yes (all "significant" exposures have been shown to be within acceptable limits) – continue and enter a "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).
 - _____ If no (there are current exposures that can be reasonably expected to be "unacceptable") – continue and enter a "NO" status code after providing a description of each potentially "unacceptable" exposure.
 - _____ If unknown (for any potentially "unacceptable" exposure) – continue and enter "IN" status code.
-

Rationale and Reference(s):

No rationale warranted.

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

 X YE – Yes, "Current Human Exposures Under Control" has been verified.

 NO – "Current Human Exposures" are NOT "Under Control."

 IN – More information is needed to make a determination.

Completed by: Dinesh Rajkotia Date 11/16/2009
Dinesh P. Rajkotia
Environmental Engineer

Supervisor: Mohamad M. Mazid Date 11/16/2009
Mohamad M. Mazid
Chief, Engineering Services Section
PADEP, SERO

Locations where References may be found:

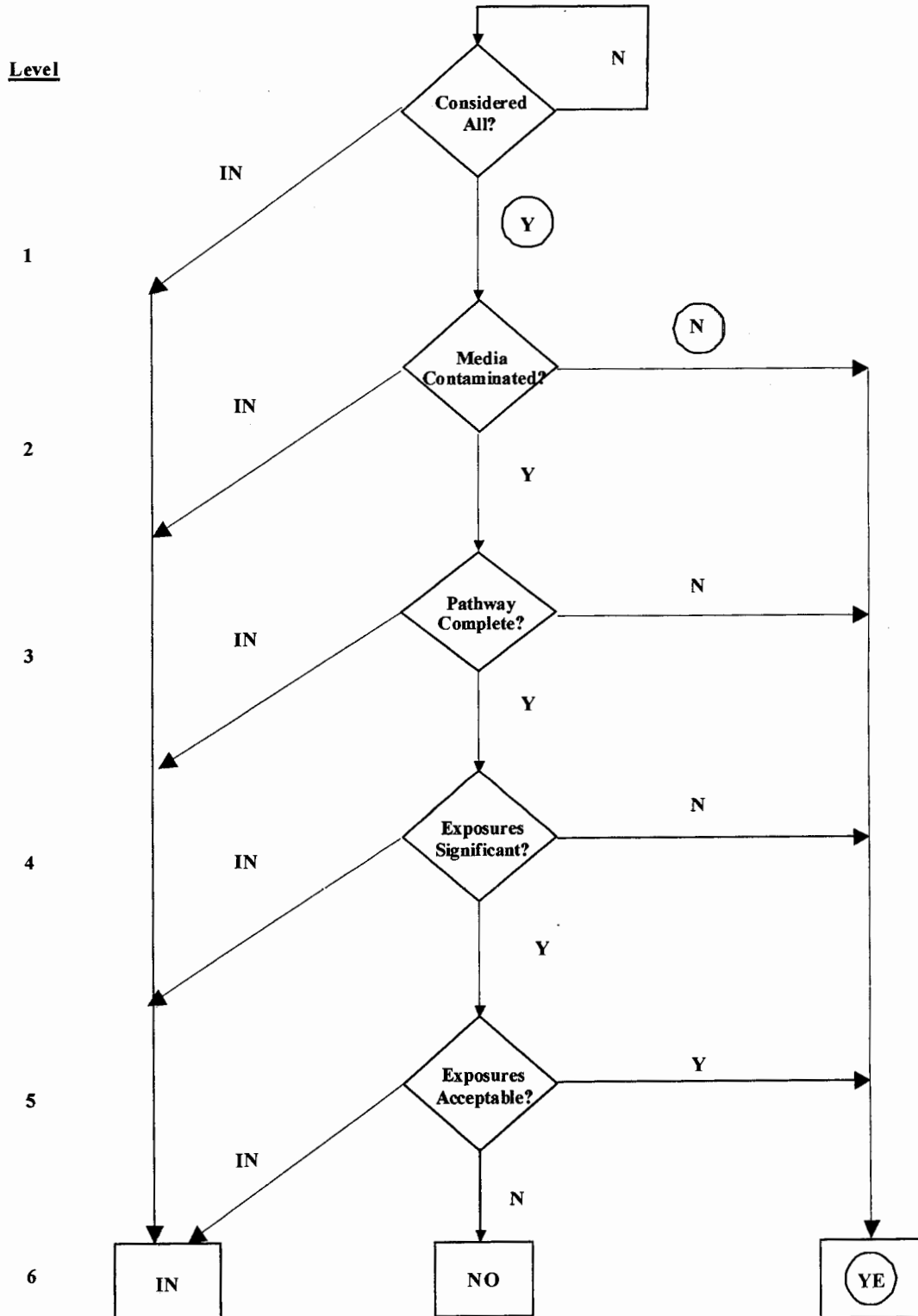
USEPA documents referenced herein can be found at USEPA's Region III office in Philadelphia, PA.
PADEP files obtained from the Southeast Regional Office (SERO) in Norristown, PA are provided in pdf format on compact disk in Appendix A of the EI Report completed for the Site (URS, August 2009). Additional documents may be located at the PADEP SERO.

Contact telephone and e-mail numbers:

Dinesh P. Rajkotia
Tel. 484-250-5738
drajkotia@state.pa.us

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

CURRENT HUMAN EXPOSURES UNDER CONTROL (CA 725)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

FINAL DECISION DOCUMENT

East Coast Chemical Disposal Company
201 East 10th Street
Marcus Hook, PA 19061
EPA ID NO. PAD980706162

I. FINAL DECISION - Corrective Action Not Applicable

The United States Environmental Protection Agency (EPA) has determined that the Corrective Action program does not apply to the East Coast Chemical Company (Facility) at 201 East 10th Street in Marcus Hook, Pennsylvania (Property). The Facility never owned or occupied this Property.

II. BACKGROUND

In August 1982 the Facility submitted its initial hazardous waste permit application for the Property. After several revisions and a period of no response from the Facility, the Pennsylvania Department of Environmental Resources denied their hazardous waste permit application in June 1987. The Facility never operated at the Property; however, other owners of the Property may have contributed to possible contamination of the Property. The cleanup of the Property is currently being addressed by the Pennsylvania Department of Environmental Protection's Hazardous Sites Cleanup Program.

III. AUTHORITY

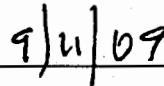
EPA is issuing this Final Decision under the authority of the Solid Waste Disposal Act, as amended by RCRA, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 to 6992k.

IV. DECLARATION

Based on the Administrative Record compiled for Corrective Action at the East Coast Chemical facility, EPA has determined that the Facility never owned or occupied the Property; therefore, Corrective Action activities are Not Applicable to this Facility.



Abraham Ferdas, Director
Land & Chemicals Division
U.S EPA Region III



Date